

[Parties and Counsel Listed on Signature Pages]

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

**META AND PENNSYLVANIA OFFICE OF  
ATTORNEY GENERAL'S STIPULATION  
AND [PROPOSED] ORDER EXTENDING  
DEADLINE TO COMPLETE  
PENNSYLVANIA RULE 30(b)(6)  
DEPOSITION**

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to Civil Local Rules 6-2 and 7-12, the Pennsylvania Office of Attorney General (“PA  
2 OAG”) and Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms  
3 Technologies, LLC (collectively, “Meta,” and together, the “Parties”), through their undersigned  
4 counsel, hereby stipulate as follows:

5 1. Under the schedule ordered by Magistrate Judge Kang on July 2, 2025, the current  
6 deadline for Meta to complete its Rule 30(b)(6) deposition of the Commonwealth of Pennsylvania is  
7 August 29, 2025. *See* ECF 2091.

8 2. Meta and the PA OAG have worked in good faith to confer about, notice, and schedule  
9 the Rule 30(b)(6) deposition of Pennsylvania. The parties originally scheduled the deposition for  
10 August 13 and 14, 2025. Following a request from the PA OAG to reschedule due to a scheduling  
11 conflict, the parties further agreed to move the deposition to August 28 and 29, 2025.

12 3. However, on August 9, 2025, the PA OAG experienced a cyber incident, caused by an  
13 outside interruption, affecting the office’s email accounts, telephone systems, and the network hosting  
14 the office’s systems. As of the date of this filing, the PA OAG remains without access to its litigation  
15 files and other systems necessary for the PA OAG to prepare for the deposition and meet its disclosure  
16 obligations.

17 4. In light of the unanticipated disruption, the Parties have agreed to extend the existing  
18 August 29, 2025 deadline for Meta to complete its Rule 30(b)(6) deposition of Pennsylvania. The  
19 parties have agreed to extend the deadline through September 30, 2025, and given the ongoing nature of  
20 the disruption agree to work together in good faith and seek any further extensions from this court as  
21 needed.

22 5. This Court has previously extended Meta’s deadline to complete fact and Rule 30(b)(6)  
23 depositions of State witnesses twice. *See* ECF 1696, 2091. This stipulated extension of the deadline for  
24 Meta to complete the Rule 30(b)(6) deposition of Pennsylvania does not and will not affect any other  
25  
26  
27  
28

deadlines already set or that may be set in this action, nor the deposition time limits already set in ECF 1696,<sup>1</sup> nor does it affect any party's or non-party's rights in relation to any other deadlines.

6. Therefore, the Parties agree that the following shall apply:

- a. Subject to the Court's approval, Meta's deadline to complete its Rule 30(b)(6) deposition of Pennsylvania shall be extended through and including September 30, 2025.
- b. The PA OAG reserves all rights related to the 30(b)(6) deposition of Pennsylvania. This agreement does not constitute a waiver of any objections the PA OAG has or may raise with respect to this deposition, nor does it alter any requirements or limitations imposed on this deposition by previous court orders, aside from the deadline for completion of such deposition.
- c. Meta reserves all rights related to the 30(b)(6) deposition of Pennsylvania, including without limitation the right to dispute any objections that the PA OAG may raise.

Respectfully submitted,

DATED: August 27, 2025

**COVINGTON & BURLING LLP**

By: /s/ Ashley M. Simonsen

Ashley M. Simonsen, SBN 275203

COVINGTON & BURLING LLP

1999 Avenue of the Stars

Los Angeles, CA 90067

Telephone: (424) 332-4800

Facsimile: + 1 (424) 332-4749

Email: [asimonsen@cov.com](mailto:asimonsen@cov.com)

*Attorneys for Meta Platforms, Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC*

---

<sup>1</sup> Meta and the PA OAG reserve all rights and arguments concerning the potential impact that ECF 1696 may have on the deposition time limit set forth in Federal Rule of Civil Procedure 30(d)(1).

**DAVID W. SUNDAY, JR.**  
Attorney General  
Commonwealth of Pennsylvania

By: /s/ Jill T. Ambrose  
Jill T. Ambrose  
Assistant Chief Deputy Attorney General  
(PA Bar No. 323549), *pro hac vice*  
Email: jambrose@attorneygeneral.gov  
1251 Waterfront Place, M Level  
Pittsburgh, PA, 15222  
Telephone: 412-565-3050  
Facsimile: 412-880-0196

*Attorney for Plaintiff Commonwealth of Pennsylvania, by  
the Pennsylvania Office of Attorney General*

**ATTESTATION**

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: August 27, 2025

By: /s/ Ashley M. Simonsen  
Ashley M. Simonsen

**[PROPOSED] ORDER**

By agreement of the Parties, and for good cause shown, **IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2025

\_\_\_\_\_  
Magistrate Judge Hon. Peter H. Kang